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Please Respond to the Marlton Office

July 6, 2017

The Honorable Jerrold N. Poslusny, Jr. VIA ELECTRONIC FILING

Re: Griffin Signs, Inc. – Chapter 7 Case No. 15-29780-JNP

Griffin Signs, Inc. v. N.J. Turnpike Authority – Adversary No. 16-1265-JNP PKF Mark III, Inc. v. Griffin Signs, Inc. – Adversary No. 16-1632-JNP

Dear Judge Poslusny:

I represent Brian S. Thomas, the Chapter 7 Trustee in this case, and I write in regard to upcoming hearings in the above-referenced adversary proceedings, specifically a Motion to Compel Discovery in the New Jersey Turnpike Authority case scheduled for July 11, 2017, and a Motion for Sanctions in the PKF Mark III, Inc. case scheduled for August 1, 2017.

By way of background, this case converted from Chapter 11 to Chapter 7 on June 13, 2017. Brian S. Thomas was appointed Trustee on June 14, 2017. Subranni Zauber LLC was retained as attorney to the Trustee on June 15, 2017, with an Order entered on June 23, 2017.

The Trustee and counsel are in the process of investigating the various adversary proceedings in this case and anticipate meeting with representatives and counsel to the Debtor during the next two weeks. At that time the Trustee will make a determination whether to have discussions with the secured lender regarding a possible carveout.

For these reasons, we respectfully request a thirty-day stay of all proceedings. Thank you for your consideration of this matter.

Respectfully submitted,
/s/ Scott M. Zauber
SCOTT M. ZAUBER

SMZ/sec